

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MEYNARD DESIGNS, INC. AND
EARTH, INC.

Plaintiffs and
Counterclaim-Defendants,

v.

EARTH PRODUCTS, INC.

Defendant and
Counterclaim-Plaintiff.

EARTH PRODUCTS, INC.

Third-Party Plaintiff and
Counterclaim-Defendant,

v.

PLANET, INC.

Third-Party Defendant and
Counterclaim-Plaintiff.

CIVIL ACTION NO. 05 cv 11781 NMG

**STIPULATION AND REQUEST FOR
ENLARGEMENT OF WRITTEN DISCOVERY PERIOD**

Difficulties in production of documents and coordinating third party discovery have rendered the deadline to request written discovery impractical. The parties have conferred and respectfully request that the court enter the new deadlines for written discovery as follows:

	Date Set Forth In Clerk's Notes	Proposed Date
Deadline to Request Written Discovery	April 30, 2007	June 30, 2007
Deadline For Responses to Written Discovery	May 31, 2007	August 3, 2007

The enlargement requested does not affect the ultimate close of fact discovery, set for August 31, 2007, or any subsequent dates, and it is not expected to result in significant delay of the case.

Accordingly, through the undersigned counsel, the parties move that the Court amend the scheduling order as set forth above.

Respectfully submitted,

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Earth Products Inc.

Dated: April 4, 2007

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

USDJ, United States District Court

Certificate of Service

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Laura Topper